

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

QUORUM HEALTH CORPORATION, *et al.*,

Debtor.

Case No. 20-10766-BLS

Chapter 11

DANIEL H. GOLDEN, AS LITIGATION
TRUSTEE OF THE QHC LITIGATION
TRUST, AND WILMINGTON SAVINGS
FUND SOCIETY, FSB, SOLELY IN ITS
CAPACITY AS INDENTURE TRUSTEE
Plaintiffs,

Adv. Pro. No. 21-51190 (BLS)

v.
COMMUNITY HEALTH SYSTEMS, INC.;
CHS/COMMUNITY HEALTH SYSTEMS,
INC.; REVENUE CYCLE SERVICE CENTER,
LLC; CHSPSC, LLC; PROFESSIONAL
ACCOUNT SERVICES, INC.; PHYSICIAN
PRACTICE SUPPORT, LLC; ELIGIBILITY
SCREENING SERVICES, LLC; W. LARRY
CASH; RACHEL SEIFERT; ADAM
FEINSTEIN; AND CREDIT SUISSE
SECURITIES (USA) LLC,

Defendants.

**DECLARATION OF GARY A. ORSECK IN SUPPORT OF MEMORANDUM (I) IN
SUPPORT OF DEFENDANTS COMMUNITY HEALTH SYSTEMS, INC.,
CHS/COMMUNITY HEALTH SYSTEMS, INC., REVENUE CYCLE SERVICE
CENTER, LLC, CHSPSC, LLC, PROFESSIONAL ACCOUNT SERVICES, INC.,
PHYSICIAN PRACTICE SUPPORT, LLC, ELIGIBILITY SCREENING SERVICES,
LLC, W. LARRY CASH, RACHEL SEIFERT, AND ADAM FEINSTEIN'S
OPPOSITION TO QUORUM'S MOTION TO INTERVENE AND (II) IN SUPPORT OF
DEFENDANTS COMMUNITY HEALTH SYSTEMS, INC., W. LARRY CASH, AND
RACHEL SEIFERT'S MOTION TO STAY LITIGATION PENDING ARBITRATION**

I, Gary A. Orseck, declare as follows:

1. I am over the age of twenty-one and competent to testify to the matters set forth herein.

2. I am a member of the law firm Robbins, Russell, Englert, Orseck & Untereiner LLP, counsel for Defendants Community Health Systems, Inc., CHS/Community Health Systems, Inc., Revenue Cycle Service Center, LLC, CHSPSC, LLC, Professional Account Services, Inc., Physician Practice Support, LLC, Eligibility Screening Services, LLC, W. Larry Cash, and Rachel Seifert.

3. I submit this declaration in support of Memorandum (I) In Support Of Defendants Community Health Systems, Inc., CHS/Community Health Systems, Inc., Revenue Cycle Service Center, LLC, CHSPSC, LLC, Professional Account Services, Inc., Physician Practice Support, LLC, Eligibility Screening Services, LLC, W. Larry Cash, Rachel Seifert, And Adam Feinstein's Opposition To Quorum's Motion To Intervene And (II) In Support Of Defendants Community Health Systems, Inc., W. Larry Cash, And Rachel Seifert's Motion To Stay Litigation Pending Arbitration, solely for the purpose of placing before the Court certain documents referenced therein.

4. Attached as Exhibit 1 to this Declaration is a true and correct copy of Separation and Distribution Agreement dated April 29, 2016.

5. Attached as Exhibit 2 to this Declaration is a true and correct copy of Letter from Gary Orseck to Don Esposito dated December 15, 2021.

6. Attached as Exhibit 3 to this Declaration is a true and correct copy of Email with attachments from Don Esposito to Gary Orseck dated January 5, 2022.

7. Attached as Exhibit 4 to this Declaration is a true and correct copy of Letter from Don Esposito to Gary Orseck dated February 4, 2022.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 7, 2022

/s/ Gary A. Orseck
Gary A. Orseck